

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH DAKOTA

In re:)	Bankr. No. 09-40702
)	Chapter 11
BIBBS, INC.)	
Tax ID/EIN 46-0434796)	MOTION FOR
)	SHORTENED NOTICE
)	
)	
Debtor.)	
)	

COMES NOW the above named Debtor by and through its attorney, Curt R. Ewinger and moves this Court to shorten notice on its Motion to Approve the Factoring Agreement with First Bank and Trust, NA doing business as Firstline Funding Group in that Firstline Funding Group funds Debtor on a daily and ongoing basis pursuant to accounts receivable assigned to Firstline Funding Group by Debtor. Without such daily funding through the Factoring Agreement, Debtor will be unable to purchase fuel and pay suppliers and its employees. Firstline Funding Group has agreed to factor Debtor's accounts receivable on an ongoing basis if it has Court approval for such but will not fund until such time as Court approval has been granted.

WHEREFORE Debtors prays that the Court enter an Order Shortening Notice on the Motion to Approve Post Petition Factoring Agreement, Super Priority Administrative Expense and Modifying Automatic Stay Pursuant to §362 and §364 of the Bankruptcy Code and for such other and further relief as the Court may deem just and equitable under the circumstances.

Dated this 29th day of September, 2009.

RICE & EWINGER

By /s/ Curt R. Ewinger
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